

# **EXHIBIT J**

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Attorneys for Plaintiff

OVERTURE SERVICES, INC.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

OVERTURE SERVICES, INC., a  
Delaware Corporation,

Plaintiff,

vs.

GOOGLE INC., a California Corporation,  
Defendant.

No. C02-01991 JSW (EDL)

**OVERTURE SERVICES, INC.'S  
FOURTH SET OF REQUESTS FOR  
THE PRODUCTION OF DOCUMENTS  
AND THINGS (NOS. 78-91) TO  
GOOGLE INC.**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff, Overture Services Inc. ("Overture"), requests that Defendant, Google Inc. ("Google"), respond in writing to the following requests for the production of documents and things. Overture requests that the documents be produced by Google for inspection and copying within thirty (30) days after the date of service hereof, at the offices of Brinks Hofer Gilson &

1 Lione, 455 North Cityfront Plaza Drive, NBC Tower, Suite 3600, Chicago, Illinois 60611,  
2 or at such time or place as counsel may agree upon.

3 If Google withholds from production any of the requested documents on the basis  
4 of a claim of attorney-client privilege or work-product immunity, Overture requests that  
5 Google provide, within thirty (30) days of service of this request, or at a time mutually  
6 agreed upon by the parties, a list identifying each withheld document in accordance with  
7 Fed. R. Civ. P. 26(b)(5).

### 8 9 **DEFINITIONS AND INSTRUCTIONS**

10 The definitions and instructions set forth in Overture's First Set of Requests for  
11 Production of Documents are hereby incorporated by reference.

### 12 13 **REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS**

14 78. All documents relating to any discussions, meetings, or communications of  
15 any sort concerning any acquisition or merger involving Google.

16  
17 79. All documents relating to any discussions, meetings, or communications  
18 involving Google and another company, corporation, or entity and concerning the '361  
19 patent.

20  
21 80. All documents relating to any discussions, meetings, or communications  
22 involving Google and another company, corporation, or entity and concerning any  
23 litigation involving Overture.

24  
25 81. All documents relating to any discussions, meetings, or communications  
26 involving Google and another company, corporation, or entity and concerning any  
27 intellectual property belonging to Overture.  
28

1           82. All documents relating to any discussions, meetings, or communications  
2 involving Google and another company, corporation, or entity and concerning  
3 infringement or noninfringement of any claim of the '361 patent.  
4

5           83. All documents relating to any discussions, meetings, or communications  
6 involving Google and another company, corporation, or entity and concerning validity or  
7 invalidity of any claim of the '361 patent.  
8

9           84. All documents relating to any discussions, meetings, or communications  
10 involving Google and another company, corporation, or entity and concerning  
11 enforceability or unenforceability of any claim of the '361 patent.  
12

13           85. All documents relating to any discussions, meetings, or communications  
14 involving Google and another company, corporation, or entity and concerning the  
15 interpretation or scope of any of claim of the '361 patent.  
16

17           86. All documents relating to any discussions, meetings, or communications  
18 involving Google and another company, corporation, or entity and concerning any oral  
19 or written opinion of legal counsel with respect to:

- 20           (a) infringement or noninfringement of any claim of the '361 patent;  
21           (b) validity or invalidity of any claim of the '361 patent;  
22           (c) enforceability or unenforceability of any claim of the '361 patent; or  
23           (d) interpretation or scope of any of claim of the '361 patent.  
24

25           87. All documents relating to any agreements entered into or proposed  
26 between Google and another company, corporation, or entity concerning any intellectual  
27 property belonging to Overture.  
28

1 88. All documents relating to any agreements entered into or proposed  
2 between Google and another company, corporation, or entity concerning any litigation  
3 involving Overture.

4  
5 89. All documents relating to any meetings or discussions between Google  
6 and FindWhat.com ("FindWhat") concerning the '361 patent.

7  
8 90. All documents relating to any agreements entered into or proposed  
9 between Google and FindWhat concerning any intellectual property belonging to  
10 Overture.

11  
12 91. All documents relating to any agreements entered into or proposed  
13 between Google and FindWhat concerning any litigation involving Overture.

14  
15 Dated: August 12, 2003

By: 

16 Jack C. Berenzweig  
17 William H. Frankel  
18 Jason C. White  
19 Charles M. McMahon  
20 BRINKS HOFER GILSON & LIONE  
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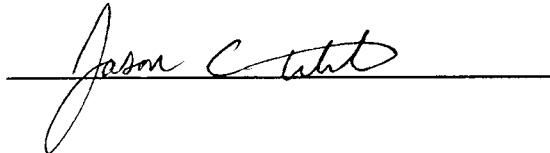
25 Attorneys for Plaintiff  
26 OVERTURE SERVICES, INC.  
27  
28

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies the foregoing OVERTURE SERVICES, INC.'S  
FOURTH SET OF REQUESTS FOR THE PRODUCTION OF DOCUMENTS AND  
THINGS (NOS. 78-91) TO GOOGLE INC., was served this 12th day of August, 2003,  
via facsimile, with confirmation copy via first-class mail, upon:

facsimile number (415) 397-7188

Michael S. Kwun  
Keker & Van Nest, LLP  
710 Sansome Street  
San Francisco, CA 94111-1704

A handwritten signature in cursive script, appearing to read "Jason C. Tate", is written over a horizontal line.